

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

LARRY VERNON HOGG
Debtor

M&T Bank
Movant

v.

Larry Vernon Hogg
Debtor

And

Katrina S. Hogg
Co-Debtor

Jack N. Zaharopoulos
Trustee

Chapter 13

Case No. 1:20-bk-01725-HWV

**ANSWER TO MOTION FOR RELIEF FROM THE
AUTOMATIC STAY & CO-DEBTOR STAY**

COMES NOW, this 3rd day of March, 2022, the above Debtor, Larry Vernon Hogg, by his counsel, CGA Law Firm, Brent C. Diefenderfer, Esquire, and files the within Motion averring that:

1. Admitted.
2. Admitted. For purposes of clarification, the undersigned counsel only represents the Debtor, Larry V. Hogg. Counsel does not represent Katrina S. Hogg, who is not a party to these proceedings.
3. Admitted.

4. Denied. Paragraph 4 refers to a writing, for which its terms speak for itself. Any characterization is denied. To the extent that the Paragraph calls for a legal conclusion, no response is required.

5. Denied. Paragraph 5 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.

6. Admitted with qualification. During these months, the Debtor had applied for and had been accepted into a forbearance, for which no payments were required to be made. Debtor has since submitted a full loan modification application packet, together with a Power of Attorney on behalf of Ms. Hogg but Movant has challenged the legal sufficiency of the Power of Attorney without adequate justification.

7. Denied. The Debtor is without knowledge as to the exact amount necessary to reinstate the loan post-petition.

8. Denied. Paragraph 8 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.

9. Denied. Paragraph 9 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.

10. Denied. Paragraph 10 states a legal conclusion for which no response is required under the Federal Rules of Bankruptcy Procedure.

WHEREFORE, the Debtor requests the Court to not enter relief from the Automatic Stay and deny the Motion of the Movant.

Respectfully submitted,
CGA Law Firm

By: /s/ Brent C. Diefenderfer, Esquire
Brent C. Diefenderfer, Esquire
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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2022, I forwarded a true and correct copy of the attached Answer to Motion for Relief from the Automatic Stay upon the following parties in the manner indicated:

Via ECF: Rebecca A. Solarz, Esquire

Dated: March 3, 2022

/s/Brent C. Diefenderfer
Brent C. Diefenderfer
CGA Law Firm
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